

REMARKS

Claims 1-5, 8-9, 13-14, 16-23, 26-27, 31-32, 34-41, 44-45, 49-50, and 52-54 were previously pending, of which claims 1, 19 and 37 have been amended. Reconsideration of presently pending claims is respectfully requested in light of the above amendments and the following remarks.

Rejections under 35 U.S.C. § 103

Claims 1, 4-5, 8, 19, 22-23, 26, 37, 40-41 and 44 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Meffert et al. (U.S. Publication No. 2002/0059144, "Meffert") in view of Cox et al. (U.S. Publication No. 2005/0044170, "Cox"). Applicants respectfully traverse this rejection as to pending claims on the grounds that these references are defective in establishing a *prima facie* case of obviousness with respect to these claims.

Independent Claim 1

The Meffert and Cox patents cannot be applied to reject these claims under 35 U.S.C. § 103 because even when combined, they do not teach the entire claimed subject matter. For example, independent claim 1 requires "receiving an indication to send an email through a send button, wherein the send button is native to the email platform" and "upon receipt of the indication, automatically converting a recipient's address from an email format to an internet format."

Meffert teaches that "instead of clicking on the traditional 'send' button provided by LOTUS NOTES, the user preferably clicks a specialized button [which] launches a login procedure to control server 200." The user is then prompted for a pass phrase or biometric identification before the email is encrypted. (paragraph [0072]).

Thus, as Meffert teaches a specialized "send" button and a required manual intervention after clicking the specialized "send" button, Meffert does not teach the limitations as required by

claim 1. Neither does the combination Meffert with Cox cure this deficiency. As stated by the Office Action, “Meffert is silent on the capability of converting recipients’ addresses from an email format to an Internet format and converting recipients’ addresses from said Internet format to said email format.” (Office Action, pg. 4).

The Office Action relies on Cox to supply this missing “converting” step . However, Cox does not supply the other mentioned limitations required by claim 1. Therefore, these references are defective in establishing a *prima facie* case of obviousness with respect to claim 1 and the rejection should be withdrawn.

Independent Claim 19

The Meffert and Cox patents cannot be applied to reject these claims under 35 U.S.C. § 103 because even when combined, they do not teach the entire claimed subject matter. For example, independent claim 19 requires a “means for receiving an indication to send an email through a send button, wherein the send button is native to the email platform,” and a “means for automatically converting a recipient’s address from email format to internet format upon receipt of the indication.”

Meffert teaches that “instead of clicking on the traditional ‘send’ button provided by LOTUS NOTES, the user preferably clicks a specialized button [which] launches a login procedure to control server 200.” The user is then prompted for a pass phrase or biometric identification before the email is encrypted. (paragraph [0072]).

Thus, as Meffert teaches a specialized “send” button and a required manual intervention after clicking the specialized “send” button, Meffert does not teach the limitations as required by claim 19. Neither does the combination Meffert with Cox cure this deficiency. As stated by the Office Action, “Meffert is silent on the capability of converting recipients’ addresses from an email format to an Internet format and converting recipients’ addresses from said Internet format to said email format.” (Office Action, pg. 4).

The Office Action relies on Cox to supply this missing “converting” step . However, Cox

does not supply the other mentioned limitations required by claim 19. Therefore, these references are defective in establishing a *prima facie* case of obviousness with respect to claim 19 and the rejection should be withdrawn.

Independent Claim 37

The Meffert and Cox patents cannot be applied to reject these claims under 35 U.S.C. § 103 because even when combined, they do not teach the entire claimed subject matter. For example, independent claim 37 requires “receiving an indication to send an email from a send button, wherein the send button is native to the email platform,” and “automatically converting a recipient’s address from email format to internet format upon receipt of the indication.”

Meffert teaches that “instead of clicking on the traditional ‘send’ button provided by LOTUS NOTES, the user preferably clicks a specialized button [which] launches a login procedure to control server 200.” The user is then prompted for a pass phrase or biometric identification before the email is encrypted. (paragraph [0072]).

Thus, as Meffert teaches a specialized “send” button and a required manual intervention after clicking the specialized “send” button, Meffert does not teach the limitations as required by claim 37. Neither does the combination Meffert with Cox cure this deficiency. As stated by the Office Action, “Meffert is silent on the capability of converting recipients’ addresses from an email format to an Internet format and converting recipients’ addresses from said Internet format to said email format.” (Office Action, pg. 4).

The Office Action relies on Cox to supply this missing “converting” step. However, Cox does not supply the other mentioned limitations required by claim 37. Therefore, these references are defective in establishing a *prima facie* case of obviousness with respect to claim 37 and the rejection should be withdrawn.

Dependent claims 2-5, 8-9, 13-14, and 16-18 depend from and further limit independent claim 1, claims 20-23, 26-27, 31-32, and 34-36 depend from and further limit independent claim

19, and claims 38-41, 44-45, 49-50, and 52-54 depend from and further limit independent claim 37 respectively, thus these claims should also be in condition for allowance.

CONCLUSION

As a result of the foregoing, it is respectfully asserted that claims 1-5, 8-9, 13-14, 16-23, 26-27, 31-32, 34-41, 44-45, 49-50, and 52-54 are in a condition for allowance. The Examiner is invited to telephone the undersigned if further assistance is necessary. Deposit account number 08-1394 can be used for any over payments or under payments.

Respectfully submitted,



David M. O'Dell

Registration No. 42,044

Dated: 10-2-07

HAYNES AND BOONE, LLP

901 Main Street, Suite 3100

Dallas, Texas 75202-3789

Telephone: 972/739-8635

Facsimile: 214/200-0853

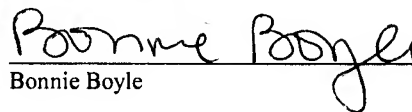
Attorney Docket No.: TS01-513 / 24061.361

Document No.: 176784_1.DOC

Certificate of Service

I hereby certify that this correspondence is being filed with the U.S. Patent and Trademark Office via EFS-Web on

Oct. 2, 2007.


Bonnie Boyle